

### **REMARKS/ARGUMENTS**

Applicants thank the Examiner for his careful review of this application. Claims 1-6, 11-14, 16, 20-22 have been rejected. Claims 7-10 are allowed. Claims 17-19 are objected to. Claims 1, 3, 7, 16, 18, 19, and 21 have been amended. Claim 17 has been canceled. Claim 15 was canceled in a prior amendment. Applicants ask the Examiner to note that Claim 7, which has been allowed, contained minor antecedent form errors which Applicants have corrected. It is respectfully submitted that the pending claims define allowable subject matter. Applicants respectfully request reconsideration of the application in view of the above amendments and the following remarks submitted in support thereof.

#### **Discussion of Objection to Claims 17-19**

In Section 11 of the Office Action, the Examiner objected to Claims 17-19 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

As kindly suggested by the Examiner, Claim 17 has been canceled and rewritten in independent form, as reflected in amended independent base Claim 16. In view of the foregoing, Applicants respectfully submit that Claims 16, 18, and 19 are in condition for allowance.

#### **Discussion of Rejection of Claim 3 under 35 U.S.C. § 112**

In Section 5 of the Office Action, the Examiner rejected Claim 3 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Applicants respectfully note that Claim 3 has been amended to clarify the coupling of the processor. Support for the amendment is provided in the originally filed application on

page 12, lines 1-3 and in Figures 5 and 7. In view of the foregoing comments, Applicants respectfully submit that amended Claim 3 overcomes the Examiner's rejection under 35 U.S.C. § 112.

**Discussion of Rejection of Claims 1, 4-6, 16, 20 and 21 under 35 U.S.C. § 102(e)**

In Section 7 of the Office Action, the Examiner rejected Claims 1, 4-6, 16, 20 and 21 under 35 U.S.C. § 102(e) as being anticipated by Ludwig et al. (U.S. Patent No. 6,816,904 B1).

The Examiner's rejection is respectfully traversed. As discussed above with respect to the Examiner's objection to Claims 17-19, Claim 17, as reflected in amended Claim 16, has been rewritten in independent form to include all of the limitations of independent base Claim 16. Accordingly, Applicants believe that the rejection of Claim 16 has been overcome and, therefore respectfully request that the rejection directed to Claim 16, and Claim 20, which depends there from, be withdrawn and Claims 16 and 20 allowed.

As to amended independent Claims 1 and 21, no where does Ludwig et al. teach or suggest a bulk decoder coupled to a network and a network data interconnect where the bulk decoder decodes data being received from the network. Rather, Ludwig et al. discloses two approaches for providing decoded data to a user workstation, namely, digital data transfer (*see* Col. 11, lines 4-15) and analog data transfer (*see* Col. 11, lines 4-15), both wherein the data is retrieved from a local storage unit prior to decoding.

Specifically, in both approaches, a request is received by the AVSM 160 from a user 40 via the network 20 (*see* Col. 10, lines 1-2; Col. 12, lines 54-56; Col. 21, lines 32-47), the AVSM 160 selects a proper AVSC 120 to process the request (*see* Col. 21, lines 58-63; Col.

22, lines 1-5), the AVSC 120 retrieves the requested data from a storage unit 124 located within the AVSC 120 or a storage unit coupled to the AVSC 120 (*see* Col. 3, lines 32-37; Col. 12, lines 4-42; Col. 14, lines 3-11; Col. 13, lines 65-66; Col. 22, lines 1-5; Col. 28, lines 32-34; Col. 29, lines 20-27), the AVSC 120 decodes the data and transmits the decoded digital data to the user 40 via the network 20 (*see* Col. 29, lines 2-27; Col. 43, lines 28-31) or, alternatively, transmits the decoded analog data to the user 40 via the A/V network 30 (*see* Col. 10, lines 6-10; Col. 43, lines 28-31).

The Examiner asserts on pages 3-4 of the Office Action that the bulk decoder of Claims 1 and 21 is taught as the AVSC 120, and the network of Claims 1 and 21 is taught as the data network 20. Therefore, the result of combining the Examiner's assertions with the teachings of Ludwig et al. provides, for purposes of illustration, that the AVSC 120 (i.e., bulk decoder) is retrieving the data, **not from the data network 20** (i.e., network), but from a local storage unit 124 within the AVSC 120 or a local storage unit coupled to the AVSC 120. As explicitly stated in Ludwig et al., "A/V file storage resources are **fully AVSC-based**" (*see* Col. 13, line 65 (emphasis added)) and "[f]or the playback or editing of an existing A/V or multimedia file, the AVSM 160 **selects an AVSC 120 upon which a copy of the file resides** and appropriate decoding or transcoding resources are present" (*see* Col. 22, lines 1-5 (emphasis added)).

The foregoing demonstrates that Ludwig et al. does not teach each and every element and limitation of amended independent Claims 1 and 21. Consequently, Ludwig et al. does not anticipate independent Claims 1 and 21.

Thus, for at least the reasons stated above regarding the Applicants submission that Ludwig et al. does not anticipate amended independent Claims 1, 16, and 21, Claims 4-6 and 20 which respectively depend directly therefrom, are too not anticipated by Ludwig et al.

Applicants request, therefore, that the § 102 rejections of Claims 1, 4-6, 16, 20, and 21 be withdrawn.

**Discussion of Rejection of Claims 2-3, 11-14 and 22 under 35 U.S.C. § 103(a)**

In Section 9 of the Office Action, the Examiner rejected Claims 2-3, 11-14, and 22 under 35 U.S.C. §103(a) as being unpatentable over Ludwig et al. (U.S. Pat. No. 6,816,914), in view of Siong et al. (U.S. Pat. No. 6,028,632).

The Examiner's rejection is respectfully traversed. First, as discussed above, Ludwig et al. does not teach or suggest a bulk decoder that decodes data received from a network, as recited in independent Claims 11 and 22. Siong et al. does not teach these missing elements. Second, the Examiner acknowledges that Ludwig et al. does not teach or suggest a central processor coupled to a demultiplexer and a multiplexer where a decoder is further coupled to the multiplexer and demultiplexer. The Examiner asserts, however, that Siong et al. provide these elements missing from Ludwig et al. because Siong et al. "teaches that the microcontroller 6 controls the demultiplexer as mentioned at least in the abstract. Therefore, the microcontroller **must** be coupled to the demultiplexer." See Office Action, mailed 11/15/05, pages 5-6 (emphasis added). Applicants respectfully disagree with the Office's assertion that Siong et al. **must** teach a controller coupled to a demultiplexer.

In fact, referring to Figure 1 of Siong et al., a "Microcontroller 6" is illustrated as being coupled to a "Header Detection & Multiplexing 2," a "Decoding Unit 3," a "Decoding Unit 4," a "Decoding Unit 5," a "Display Buffer 7," a "Display Buffer 8," and a "Display Buffer 9." A "Demultiplex 10" is illustrated as being coupled to the "Display Buffer 7," the "Display Buffer 8," the "Display Buffer 9," and a "Post Filter 11."

Further, in Siong et al. Claims 1, 3, 6, 7 and 10, the coupling associated with the controller and the demultiplexer elements are described as follows: “controlling means, coupled to said transferring means and said display buffer”; and “demultiplexing means, coupled to said display buffers.”. Similarly, in the Abstract of Siong et al., the coupling of the demultiplexer is described as “[a] demultiplexer coupled to the display buffers.”

Applicants have carefully read Siong et al. in its entirety, and no where does Siong et al. teach or suggest a **coupling** between a controller and a demultiplexer. Rather, Siong et al. teach a controller coupled to three display buffers (as mentioned above) and the controller controlling the **operation** of the demultiplexer by rotationally selecting, at any one time, only one of several display buffers for output to the demultiplexer. *See* Col. 4, lines 15-20.

Moreover, one of ordinary skill would not be motivated to apply the principals taught in Siong et al. to those taught in Ludwig et al., as the principals taught in Siong et al. are functionally incompatible with the principals taught in Ludwig et al. Specifically, Ludwig et al. require decoders that are capable of supporting **multiple simultaneous decoding sessions** (*see* Col. 15, lines 1-6) **or multiple concurrent decoding sessions** (*see* Col. 15, lines 7-11; Col. 14, line 48). Siong et al., on the other hand, require **multiple interlace video decoders running in a pipeline manner** (*see* Col. 4, lines 9-21; Col. 47-67) “to achieve the bandwidth and timing required to decode progressive video bitstream received from a transmission channel and display as a non-interlace flicker free video output (*see* Col. 4, lines 47-52).

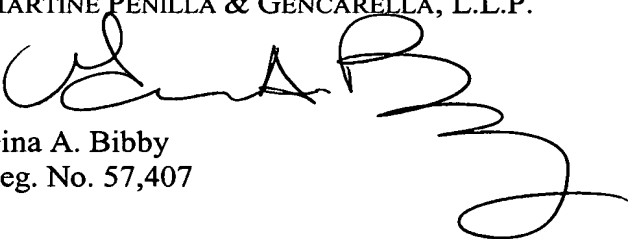
In order to establish a prima facie case of obviousness, the rejection must demonstrate that (1) the cited references teach all of the claimed elements and limitations; (2) there is a suggestion or motivation in the prior art to modify or combine the reference teachings; and (3) there is a reasonable expectation of success. MPEP § 2143; *In re Vaeck*, 20 USPQ2d 1438 (Fed. Cir. 1991).

Accordingly, Applicants submit that Claims 2-3, 11-14 and 22 are patentable under 35 U.S.C. § 103(a) over Ludwig et al. in view of Siong et al. Applicants therefore respectfully request reconsideration, and withdrawal of the § 103 rejections.

**Conclusion**

In view of the foregoing, the Applicant respectfully submits that all the pending Claims 1-14, 16, and 18-22 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is requested to contact the undersigned at (408) 749-6920. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP580). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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## **IN THE DRAWINGS**

### **Amendments to the Drawings:**

The attached drawing sheets provide changes to Figures 6 and 7 to correct misspellings of the term “multiplexer.” These sheets replace the original sheets for Figures 6 and 7.